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17 UNITED STATES DISTRICT COURT
18 SOUTHERN DISTRICT OF CALIFORNIA

19 VIASAT, INC.,

20 Plaintiff,

21 vs.

22 SPACE SYSTEMS/LORAL, LLC f/k/a
23 SPACE SYSTEMS/LORAL, INC.,

24 Defendant.

CASE NO. 3:13-cv-2074-H-WVG

**JOINT MOTION TO FILE
DOCUMENTS UNDER SEAL**

Pursuant to Federal Rule of Civil Procedure 26(c)(1), Patent Local Rule 2.2, and the Protective Order entered by the Court in this action (Dkt. 60), Plaintiff ViaSat, Inc. (“ViaSat”) and Defendant Space Systems/Loral, LLC (“SSL”) submit this motion to file under seal copies of the following materials:

- an unredacted copy of Exhibits A-H to the Parties’ Joint Statement Regarding Discovery Dispute.

ARGUMENT

The Parties are subject to the Court’s Protective Order in this case. (Dkt. 60.) The Protective Order provides that if the Parties file with the Court certain protected material produced in discovery, they must move to file that material under seal:

Before any materials produced in discovery, answers to interrogatories, responses to requests for admissions, deposition transcripts, or other documents which are designated as “CONFIDENTIAL,” “CONFIDENTIAL—COUNSEL ONLY,” and/or “CONFIDENTIAL—PROSECUTION BAR”, and/or CONFIDENTIAL—OUTSIDE COUNSEL ONLY, and/or “SENSITIVE—SUBJECT TO EXPORT CONTROL,” and/or “HIGHLY CONFIDENTIAL—SOURCE CODE” are filed with the Court for any purpose, the party seeking to file such material must seek permission of the Court to file the material under seal.

(*Id.* ¶ 15.)

The materials that the Parties request the Court file under seal include those that have been designated as “CONFIDENTIAL,” “CONFIDENTIAL—COUNSEL ONLY,” “CONFIDENTIAL—PROSECUTION BAR,” and/or CONFIDENTIAL—OUTSIDE COUNSEL ONLY and not publicly available , or disclose or discuss such materials. The Parties therefore respectfully request that these materials be filed under seal.

1 A Proposed Order is lodged herewith.

2
3 DATED: August 4, 2014

Respectfully submitted,

4
5 By /s/ Thomas H. Zellerbach

By /s/ Sean Pak

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CERTIFICATE OF SERVICE

I hereby certify that, August 4, 2014, I caused the JOINT MOTION TO FILE DOCUMENTS UNDER SEAL to be served on Defendant's counsel via the Court's CM/ECF system.

DATED: August 4, 2014

By /s/ Sean S. Pak